

From: Arnold Whitridge
Sent: Thursday, February 05, 2004 12:13 PM
To: Dabbs, Paul
Subject: North Coast Jan 30 version comment

Comments on North Coast Regional Report, January 30 version
by Arnold Whitridge, 2-5-04

Page 3, third paragraph: The first sentence ("Irrigated agriculture in the North Coast Region uses most of the region's water") is not correct. It could perhaps be reworded to be correct, but the following sentence attempts to make the point that seems to be intended, so I suggest simply deleting the first sentence. The second sentence ("Irrigation today accounts for about 81% of the region's water use...") neglects instream uses and the ongoing interregional export from the Trinity river, which in most years is larger than all other developed uses of the region's water combined. I suggest making this sentence read "Irrigated agriculture accounts for 81% of the developed water used within the region...").

Page 3, last paragraph: The Trinity should be included in the list of Wild and Scenic rivers. It could be argued that the Trinity is already included because it's in the Klamath system, but other parts of this narrative offer information specific to the Trinity, which I think is appropriate, and inclusion of the Trinity here would be consistent with the other treatments and helpful to the reader.

Page 4, third paragraph: Again, the Trinity should be included among the Wild and Scenic rivers. "Protests" in the second sentence would be better as "protects" or "preserves". The second half of this paragraph relative to the Trinity is not right, and not consistent with the better treatment on page 9. I would change this language to something like: "Additional water may be reallocated to the Trinity River, depending on the results of litigation over a fishery restoration plan approved by the Department of the Interior in December 2000."

Page 7, last paragraph: It does not seem reasonable to note that the Eel, Mad, Trinity, and Garcia Rivers and Redwood Creek suffer from sedimentation without noting that most of the other rivers do too, notably including the Klamath and the Russian, about which readers are likely to be interested. For reference, please see the NCWQCB list of impaired waterbodies which was included in an earlier draft.

Page 9, last paragraph, extending on to page 10: The log of comments and responses for the previous draft indicates that the Eel-to-Russian diversion now is or should be discussed, but I can't find any discussion here or elsewhere. No doubt the diversion is an issue before the Eel-Russian River Commission mentioned on pages 12 and 14, but how would a reader know this? In order to characterize the State of the Region, and give readers an idea of what to expect in Looking to the Future and/or Regional Planning, I recommend including specific information about existing diversion arrangements and the changes

which are now under consideration. How much water is conveyed from the Eel to the Russian? What percentage is this of total supplies on each side, how important is the diverted amount to each watershed, and what are the apparent effects of the diversion in each watershed? What changes are proposed, and what would be the effects of the changes?

Page 13, Looking to the Future: It seems beyond dispute that the future of water management (and development) in the North Coast region will include and be largely shaped by issues of fishery restoration, tribal rights, TMDL adoption and implementation, and watershed management. This Looking to the Future section should recognize and discuss such issues in order to be helpful to the reader and be in step with the whole spirit and thrust of this water plan update.